



National Pork Producers Council

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February 21, 2003

Country of Origin Labeling Program
Agricultural Marketing Service
U.S. Department of Agriculture
STOP 0249
Room 2092-S
1400 Independence Avenue, S.W.
Washington, DC 20250-0249

RE: Notice of Request for Emergency Approval of New Information Collection; 67 Fed. Reg. 70205, November 21, 2002. Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts under the Authority of the Agricultural Marketing Act of 1946.

Dear Country of Origin Labeling Program Officer:

The National Pork Producers Council (NPPC) is pleased to submit our comments, on behalf of its members, in response to the Notice of Request for Emergency Approval of New Information Collection; 67 Fed. Reg. 70205, November 21, 2002. Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts under the Authority of the Agricultural Marketing Act of 1946.

NPPC conducts public policy outreach on behalf of its 44 affiliated state association members, representing over 80,000 pork producers. NPPC is committed to enhancing opportunities for the success of U.S. pork producers and other industry stakeholders by establishing the U.S. pork industry as a consistent and responsible supplier of high quality pork to the domestic and world market.

NPPC has several concerns about the U.S. Department of Agriculture (USDA) Agricultural Marketing Service's (AMS) request for approval from the Office of Management and Budget for emergency approval of new information collection under the interim voluntary country of origin labeling program.

We believe that this request for emergency record keeping on a voluntary program is unnecessary, premature, and contrary to the voluntary nature of the program. AMS has not specifically stated what specific information is to be collected. Without this it is difficult to comment on the practical utility of the information. The preamble of the voluntary



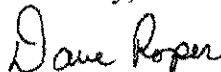
guidelines makes clear, "the Secretary will not perform surveillance of retailers, investigate complaints, prosecute violations, or otherwise enforce provisions of the voluntary guidelines." Therefore, NPPC does not understand the need for emergency new information collection authority, at this time.

AMS estimates that producers likely to be affected by the mandatory program will participate in the voluntary program. The voluntary guidelines discuss the idea that when the benefits outweigh the costs, producers are more likely to participate in the program. To date, we are not aware of any pork producer who is actively participating in the voluntary program.

NPPC believes that AMS' rough producer cost estimates are incomplete and seriously underestimate the time requirements and costs associated with developing a voluntary record keeping system for varying pork production systems in the United States. Without detailed information on what type of record keeping and format is acceptable it is very difficult to attach a credible cost estimate. We will be submitting detailed comments on the costs and the substance of the record keeping requirements in the voluntary guidelines by April 9, 2003.

We appreciate the opportunity to present comments on behalf of America's pork producers. If you have any additional questions, please contact Ms. Audrey Adamson, Director, Government Relations at (202) 347-3600.

Sincerely,



Dave Roper

President

National Pork Producers Council